

General Instructions for Completion of 1x Element Performance Inspections

The following general instructions provide explanations and guidance for each section of the Version 1.x Element Performance Inspection data collection tools. EPIs are accomplished by trained and qualified FAA Operations, Airworthiness, Cabin Safety, or Dispatch Aviation Safety Inspectors (ASI) assigned to an Air Transportation Oversight System (ATOS) Certificate Management Team (CMT) or a Certification Project Team

ELEMENT SUMMARY INFORMATION

Purpose of this Element (Certificate Holder responsibility):

This defines the intent of the element and the scope of the Certificate Holder's responsibility.

Objective (FAA responsibility):

This defines the scope of the inspection in general terms.

Specific Instructions:

Some data collection tools may contain specific instructions for additional training, background or qualifications that may be helpful in determining inspector assignments. Specific instructions may also include additional references, background information, or manuals that should be reviewed, as well as suggestion for specific types of activities and/or reporting instructions.

Related EPIs:

A list of related elements is provided primarily for reference and background information. Inspectors should review the data collection tools for related elements. There may be situations when activities for one EPI may be accomplished in conjunction with activities of related EPIs.

Supplemental Information

Specific Regulatory Requirement(s) (SRRs): An SRR is a Federal Aviation Regulation that is refined to its most specific level. SRRs are included with each EPI as a reference for the inspector.

Questions that are based upon regulatory requirements have an SRR appended to them. Therefore a "No" answer to such a question may require an enforcement investigation. On the other hand, questions that do not have an SRR appended to them are not regulatory in nature, but are based upon system safety principles. A "No" answer to this type of question, while not a violation, would be an indicator of a risk that may require additional action on the part of the CMT.

Related CFRs & FAA Policy/Guidance: Related CFRs and FAA Policy/Guidance are included for background information that is necessary to accomplish the inspection.

At the time of publication, the guidance material was considered current. If the guidance has been updated since the data collection tool was published, the inspector should read the latest version even if it is not specifically mentioned in the tool. Subsequent revisions to the EPI data collection tools will incorporate

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updates to this guidance material. However, revisions will not be generated based solely on out-of-date guidance. Even if it is out of date or superseded, the listed guidance may be useful as a starting point in researching current guidance.

EPI Section 1 – Performance Observables

Objective: (FAA Responsibility):

To determine if the Certificate Holder's process is functioning as designed and achieving the desired results. To accomplish the objective, the inspector should complete the tasks identified on the data collection tool and answer each question in the section at least once.

Tasks:

Each data collection tool contains the statement, *"To meet this objective, the inspector will accomplish the following tasks (at the inspection location(s) where applicable):"* The data collection tool then lists certain tasks that should be completed during the inspection. Each task is made up of various activities. Some common tasks that may be listed on an EPI are:

1. Review the CFR Regulatory Requirements and FAA Policy/Guidance included in the Supplemental Information section. of this EPI Data Collection Tool.

The inspector should review the related CFRs and FAA Policy and Guidance documents included with each EPI.

2. Review the policies, procedures, or instructions and information, and the corresponding controls found in the SAI Data Collection Tool.

A review of the associated SAI data collection tool and the results of any completed SAIs provide the inspector with useful information about the Certificate Holder's systems and can help the inspector to identify areas of potential risk. The controls attribute section of each SAI lists checks and restraints that must be built into the Certificate Holder's process to help ensure that the desired results are consistently achieved. While most controls are not regulatory, they are an important safety attribute with desirable features that help to reduce risk. The inspector will be asked in a subsequent question if the controls were being followed.

3. Review the Certificate Holder's manuals.

The inspector should review and gain an understanding of the Certificate Holder's policies and procedures for the element they are inspecting in order to plan their inspection activities. This will usually involve reviewing sections of the appropriate Operations Specifications, manuals, training programs or other guidance. A subsequent question will ask the inspector if the Certificate Holder followed its policies and procedures.

4. Observe the process to gain an understanding of the procedures, instructions and/or information contained in the Certificate Holder's manual.

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The purpose of an EPI is to determine if the Certificate Holder is following their approved policies and procedures, and to confirm that those policies and procedures are achieving the desired result. Data collection tool questions are not designed to be answered by the Certificate Holder's personnel during discussions. In completing this task, the inspector asks questions to find out if the Certificate Holder's employee or contractor is following the Certificate Holder's policies and procedures.

Questions :

Each EPI lists a series of questions for the inspector to answer based on their observations during the various activities. Questions on each activity report are answered in response to what was observed on that single activity. Based upon the scope of the EPI and complexity of the Certificate Holder's process, inspectors should develop a plan of research, observation, inspection, and evaluation that will result in the gathering of quality data.

Job Task Items (JTIs) - Job Task Items (JTIs) are included with questions for inspector reference only. JTIs aid the inspector in determining if a certificate holder's written policies, procedures, instructions and information are adequate. The inspector is not expected to respond to each JTI individually. The JTI's listed below each question are there to aid an inspector in answering the question. .

Typically, the Performance Observable EPI questions will include the following:

1. Were the following performance measures met?

Each EPI lists performance measures that are specific to that element. Performance measures determine if the Certificate Holder's process is achieving the desired results as described in the "Purpose of this element (**Certificate Holder responsibility**)]. Although it's not a prerequisite, performance measures are mostly based on regulatory requirements.

2. Were the policies and procedures followed?

The inspector needs to gain a thorough understanding of the Certificate Holder's policies and procedures in order to answer this question. Responses are only for the activity currently being conducted. All policies and procedures will not be observed during each activity. In certain instances, question 2 and some parts of question 1 may seem to be repetitive. Each of those questions should still be answered independently of the other. Question 1 is focused on the results of the performance measures that are built into the Certificate Holder's process. Question two is focused on the certificate holder's policies and procedures themselves.

3. Were the identified controls followed?

This question refers to the controls that are identified in the associated SAI controls attribute section. Controls are checks and restraints that must be built into the Certificate Holder's process to help ensure that the desired results (purpose of the element) are consistently achieved. A review of those controls will help the inspector answer this question. Not all the controls will be observed during each activity.

4. Did the records comply with the policy and procedures?

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The inspector needs to understand the Certificate Holder's system sufficiently to know what records and reports are generated or used during the processes and procedures for the element. A representative sample of these records should be reviewed and assessed for compliance with regulations and the Certificate Holder's policies, procedures, instructions and information. A separate activity record is not necessarily required for each individual record or report, but should be completed for each group of records or reports at a specific location on the date of observation.

5. Were the Process Measurements effective in identifying and providing corrective action for problems or potential problems?

Review the Process Measurements section of the SAI and Certificate Holder's manuals to understand what measures the Certificate Holder has designed into the process. Conduct activities to determine if the Process Measurements were effective in identifying and providing corrective action for problems or potential problems.

6. Did personnel properly handle the associated interfaces by complying with other written policies, procedures or instructions and information that are interrelated with this Element.

EPI Section 2 – Management Responsibility & Authority Observables

Objective:

This section asks a series of questions about a clearly identifiable person who is answerable (responsible) for the quality of the process and/or who has the authority to establish and modify the process.

Tasks:

- 1. Identify the person that has overall responsibility for the process.**
- 2. Identify the person that has overall authority for the process.**

The intent is to identify the highest-level person (at the appropriate level within the organization) who is responsible for the quality of, or who has the authority to change, the process. In any organization there is not always one individual who is in charge. Authority and responsibility are often disbursed. A person can be an individual, a department, a committee, or a position.

?? If there have not been any personnel or program changes affecting the Responsibility or Authority Attributes since the last SAI and/or EPI was completed, then skip tasks 3-6, answer questions 2.1 & 2.2 including the name/title, answer "N/A" to questions 2.3-2.10.

3. Review the duties and responsibilities of the person(s) documented in the Manual System.

The inspector needs to understand the Certificate Holder's system sufficiently to know the duties and responsibilities of individuals assigned the Responsibility for, or Authority to establish or modify, each process.

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4. Evaluate the qualifications and work experience of the person(s) above (or resume, if appropriate).

The purpose of this task is to determine that the individuals with responsibility for, or authority to establish or modify, a process meets the qualifications to hold that position. In some instances, there may be regulatory requirements for those qualifications and the CHDO may have a copy of the individual's resume on file. The assigned inspectors should coordinate with the PIs when obtaining any resumes. In other instances the qualification may be a certain certification or rating that may be demonstrated by looking at that individual's training records or FAA certificate, or by evaluating some level of expertise or a particular background. It is not the intent to require a formal written resume from all individuals.

5. Review the appropriate organizational chart.

The inspector needs to understand the Certificate Holder's organization sufficiently to identify who has the authority to establish or modify, and/or responsibility for certain processes. In any organization there is not always one individual who is in charge. Authority and responsibility are often disbursed. A person can be an individual, a department, a committee, or a position (such as pilot in command).

6. Discuss the process with the person(s).

Data collection tool questions are not to be asked of, and answered by, Certificate Holder personnel during interviews or discussions. In completing this task, the inspector asks questions to find out if the identified person(s) who is responsible for, and/or who has the authority to establish or modify a process, understands the Certificate Holder's policies and procedures for the process. The inspector should not ask a person, "Are you responsible?" rather he or she should ask questions and make observations to find out enough about how the carrier performs that process to determine who is responsible.

Questions:

Each EPI lists a series of questions for the inspector to answer based on their observations during the various activities. Questions on each activity report are answered in response to what was observed on that single activity. Based upon the scope of the EPI and complexity of the Certificate Holder's process, inspectors should develop a plan of research, observation, inspection, and evaluation that will result in the gathering of quality data.

2.1. and 2.2

The purpose of these questions is to identify by name and title the person who is responsible for the quality of the process and the person who has the authority to establish and modify the process. If there have been no changes in personnel or the program since the last SAI/EPI were completed, the remaining questions are answered "N/A."

2.3-2.10

Answer these questions if there have been changes in personnel or the program that affect the Responsibility and Authority Attributes for the process.

Master EPI Record:

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All questions in the Performance Observable Section, and at least questions 2.1 and 2.2 in the Management Responsibility & Authority Observables Section must be answered in order to save the EPI to the Master Record.

Multiple inspection activities will typically be accomplished for each EPI. When reporting an individual EPI activity, the ASI enters responses only to those questions that can be answered directly from the activity being reported. Each inspector shall conduct as many individual activities as necessary to accurately answer the questions. Most EPIs will be completed in a reasonably short timeframe, typically between 30-60 days.

EPI Activities:

EPIs usually involve multiple activities over multiple dates and may involve multiple locations (a sufficient number of activities to answer all the questions and perform a thorough, quality inspection). A general rule of thumb is that any time that the common data field information changes, (date, location, aircraft, etc.) it is a new activity. It is not the intent to have an activity record for every individual record you look at, but maybe each set of records at that location on that day. Since an activity is a snapshot of what the operator is doing at that moment, most activities will probably be opened and closed in a single day.

EPI Common Data Fields.

Enter all the information you have available from each activity. At a minimum, every inspection activity should include Activity Start Date, Activity End Date, and Departure Point/Location. If the inspection activity involves an aircraft, the registration number and make, model and series must be entered. If the activity involves an aircraft flight, arrival point, departure point, and flight number must be entered. If the activity includes an en route inspection, the control number from FAA Form 8430-13, *Request for Access to Aircraft* must be entered. Additional guidance for each data field is found in the ATOS Automation User Guide.

Response Definitions :

Since the EPI questions are answered with either a "Yes" or "No" and for some EPI questions, a third answer option of "N/A; it is important to understand the implications of those answers.

?? A “Yes” response means that the specific question being asked, for the particular EPI activity being observed, complies with applicable specific regulatory requirements (SRR), related CFRs, and/or any FAA policies or guidance appropriate to that element. Further a “Yes” response indicates that the observed procedures and system safety principles approved/accepted for the Certificate Holder are being followed.

A “Yes” response always indicates a positive response. Great care should be taken when determining if the response is positive. If the inspector indicates a positive answer using a qualifier (e.g. “Yes, but...”) this may indicate that the answer should actually be a “No.” In that case the inspector should re-evaluate his/her answer.

There may be rare circumstances that it is not possible to observe an event listed on the EPI (e.g. boarding of an intoxicated passenger). On those EPIs the questions are worded so that a “Yes”

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answer would indicate compliance since the event was not observed. The specific instructions for those EPIs have further details on how to appropriately answer the questions.

?? A “**No**” response **means** that on the specific question being asked, for the particular EPI activity being observed, the certificate holder either does not comply with observed specific regulatory requirements (SRR), related CFRs, and/or applicable FAA policies or guidance for that element, or that the certificate holder’s procedures are not being followed. A “No” response can also mean that system safety procedures are weak in the area being evaluated and that the certificate holder’s approved/accepted procedures are inadequate.

Drop Down Menus:

A “No” response requires the inspector to select one or more potential problem areas that caused the “No” response from the associated drop-down menu. The inspector must include an explanation in the “No” comments box for each area selected. If the choices available do not adequately describe your observation, select “Other” and provide an explanation in the comment block.

Observed non-compliance with regulations should necessitate coordination with the Principal Inspector and may result in an enforcement investigation. It should be noted that an **enforcement investigation would not be required** when a “No” response identifies weaknesses in a system that has literal compliance with the regulations or in the case where, in the inspector’s opinion, any approved/accepted procedures are inadequate.

NOTE: Significant issues or items of immediate concern, as determined by the inspector, shall be verbally conveyed to the PI in a timely manner. Either an electronic message or memorandum should follow up verbal conveyance.

?? An “**N/A**” (Not Applicable) response is provided for those questions that may not apply to all certificate holders. N/A means that a particular question does not apply to the certificate holder being evaluated due to such reasons as type of operation, type of aircraft, or area of operation, etc. N/A does not mean “not observed” or that not enough time was available to answer the question. If a question applies to a Certificate Holder, then enough observations should be conducted to appropriately answer the question. Since this option is associated only with questions that are not applicable due to the types of operations authorized for the particular Certificate Holder, a simple comment must be entered as to why this was marked N/A (e.g. Certificate holder does not conduct Flag operations).

Comment Fields:

All comments should be written in clear, concise language, using sentence case and proper spelling. Explanations should be complete and descriptive, with as much information as necessary for other CMT members to understand the comments without requiring further information from the inspector. Comments submitted in the ATOS automated tools should include who, what, where, when, why, and how. References may be entered when appropriate.

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ASIs should not enter the word “None” in any comment field. If a particular comment field does not apply, just leave it blank. Comment fields should be used to report observed facts, not inspector opinion. Comments that do not directly relate to the question being answered are inappropriate. An important function of the Data Evaluation Program Manager is the review of comment fields to ensure that quality data enters the ATOS database. **The DEPM shall return any records for correction that do not meet the ATOS data quality guidelines.**